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RE:

EB Docket No. 06-36

Ms. Marlene H. Dortch, FCC Secretary

Federal Communications Commission 445 12<sup>th</sup> Street, SW, Suite TW-A325

Annual 64.2009(e) CPNI Certification for:

Custom Network Solutions, Inc. - Form 499 Filer ID 813213

Dear Ms. Dortch:

February 12, 2009

Office of the Secretary

Washington, DC 20554

Via ECFS

Enclosed for filing is the 2008 CPNI Compliance Certification submitted on behalf of Custom Network Solutions, Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 09-9 issued January 7, 2009.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to <a href="mailto:mbyrnes@tminc.com">mbyrnes@tminc.com</a>.

Sincerely,

Monique Byrnes

Consultant to Custom Network Solutions, Inc.

Attachment

cc:

FCC Enforcement Bureau (provided via ECFS)

Best Copy and Printing (via email to FCC@BCPIWEB.COM)

M. Rozar – Custom Network Solutions

file:

Custom Network Solutions - CPNI

tms:

FCCx0901

Annual 64.2009(e) CPNI Certification for:

Calendar Year 2008

Date Filed:

February 12, 2009

Name of Company covered by this certification:

Custom Network Solutions, Inc.

Form 499 Filer ID:

813213

Name of Signatory:

Mare Rozar

Title of Signatory:

President

## I, Marc Rozar, certify and state that:

I am President of Custom Network Solutions, Inc. and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification as Exhibit A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Marc Rozar, President

Custom Network Solutions, Inc.

Date

Attachment A
Statement of CPNI Procedures and Compliance

Custom Network Solutions, Inc.

Calendar Year 2008

## Custom Network Solutions, Inc.

## Statement of CPNI Procedures and Compliance

Custom Network Solutions, Inc. ("Company" or "CNS") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. CNS has trained its personnel not to use CPNI for marketing purposes. Should CNS elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

CNS Customer Service personnel do not release CPNI or call detail information to incoming callers. CNS Customer Service representatives call the authorized Customer Contact at their Business Telephone Number to release customer requested CPNI. CNS will only release CPNI or call detail information to third parties after receiving both written and verbal consent from the authorized Customer Contact.

Customers are notified of account changes without revealing the change information or sending the notification to a changed or new account contact. This is done via telephone to the Customer Contact of record.

CNS does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical or account information and customer notification of account changes.

CNS does not have retail locations and therefore does not allow in-store access to CPNI.

CNS has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI.

Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

CNS maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. Such procedures require notification and management of the process by the Company President.

The Company has not taken any actions against data brokers in calendar year 2007.

The Company did not receive any complaints about unauthorized release or Disclosure of CPNI from December 8, 2007 through December 31, 2008.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.